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July 8, 2025

**VIA ECF FILING**

Honorable Margaret M. Garnett  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

*Re: NRD Group LLC, et al. v. Centiva Capital, LP, No. 24-CV-07245 (S.D.N.Y.)*

Dear Judge Garnett:

We represent Defendant Centiva Capital (“Centiva”) in the above-referenced action. Out of an abundance of caution, we write to request permission to file under seal certain materials that potentially contain Plaintiffs’ proprietary, commercially sensitive, or trade secret information in (1) Centiva’s motion to compel production of improperly withheld documents and (2) the exhibits cited therein.

Your Honor has granted Defendant’s request to seal competitively sensitive information previously in this action (*see* Dkts. 28, 35, 40). While Centiva disputes that its motion papers contain any trade-secret information belonging to Plaintiffs, the exhibits cited therein include documents that Plaintiffs designated as Confidential Attorneys’ Eyes Only under the Protective Order in this case (Dkt. 44). Accordingly, pursuant to Section 6.14 of the Southern District of New York’s Case Filing Rules and Instructions and Section I.D.3.ii of this Court’s Individual Rules and Practices, Centiva respectfully moves for permission to file its Motion to Compel Production of Documents under seal. Centiva will coordinate with Plaintiffs to file a public version with proposed redactions of its Motion within three business days (end of day July 11, 2025).

Respectfully submitted,

*/s/ May Chiang*

*Counsel for Centiva Capital, LP*

cc: All Counsel of Record via ECF